DISTRICT OF NEVADA

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Plaintiff,

VS.

LVGV, LLC, D/B/A THE M RESORT SPA CASINO,

Defendant.

Case No.: 2:20-cv-2145 -JAD-VCF

STIPULATION FOR EXTENSION OF TIME REGARDING PRE-TRIAL ORDER (ECF NO. 51)

(Third Request)

The parties by and through their respective counsel of record, hereby submit this Stipulation to Continue The Deadline For The Joint Pretrial Order (Third Request).

The parties first stipulated to extend the discovery deadlines on June 24, 2021 (ECF No. 26) and the Order granting the stipulation was filed on June 28, 2021 (ECF No. 28). The parties entered into a second stipulation to continue discovery on September 1, 2021 (ECF No. 30). That stipulation was denied on September 3, 2021 (ECF NO. 31) and the parties filed a new stipulation on September 7, 2021 (ECF No. 32). The order granting said stipulation was filed on September 9, 2021 (ECF No. 33). The parties filed a fourth request on November 22, 2021 (ECF No. 36) and the stipulation was granted in part and denied in part (ECF No. 38) on November 23, 2022.

Defendant filed a motion for summary judgment on May 20, 2022 (ECF No. 38). Plaintiff filed her opposition on June 3, 2022 (ECF No. 39). Defendant filed a reply brief on June 10, 2022 (ECF No. 40). The Court heard oral arguments on January 11, 2023 and denied Defendant's motion. In doing so, the Court set a settlement conference (ECF No. 45). The parties held a settlement

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conference on March 16, 2023 and could not reach a resolution (ECF No. 46). The Court had set a deadline for the joint pre-trial order for ten days after the settlement conference (ECF No. 44). The parties filed a stipulation to extend this date to April 10, 2023 (ECF No. 48) and the Court approved it on March 30, 2023 (ECF No. 49). The parties filed a second stipulation to extend this date to April 24, 2023 (ECF No. 50) and the Court approved it on April 11, 2023 (ECF No. 51).

The parties still need additional time to finalize this order. The parties have identified their proposed witnesses and exhibits and are in the process of reviewing each other's lists in order to formulate objections for the Court. The parties have made significant process in narrowing the scope of trial and the exhibits to be used, thus the time used so far in finalizing the order has been for the Court and the parties' benefit. Now almost being down, the parties thus request a short two week extension. The new deadline is as follows:

Event	Current Date	New Date
Pre-Trial Order	April 24, 2023	May 8, 2023

DATED this 24 th day of April, 2023	DATED this 24 th day of April, 2023
INJURY LAWYERS OF NEVADA	WILSON ELSER WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP
/s/ Jared Anderson Jared Anderson, Esq. Nevada Bar No. 7308 4001 Meadows Lane Las Vegas, NV 89107 Attorney for Plaintiff	/s/ Michael Lowry Michael P. Lowry, Esq. Nevada Bar No. 10666 6689 Las Vegas Blvd. South, Suite 200 Las Vegas, NV 89119 Attorney for LVGV
	IT IS SO ORDERED. UNITED STATES MAGISTRATE JUDGE

April 25, 2023